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The Cardoza Law Corporation 1 Michael F. Cardoza, Esq. (SBN: 194065) Mike.Cardoza@cardozalawcorp.com Lauren B. Veggian, Esq. (SBN: 309929) Lauren.Veggian@cardozalawcorp.com 4 548 Market St., #80594 San Francisco, CA 94104 Telephone: (415) 488-8041 Facsimile: (415) 651-9700 Attorneys for Plaintiff, **David Mitre** 8

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

DAVID MITRE,

Plaintiff,

v.

WAKEFIELD AND ASSOCIATES, LLC,

Defendant.

Case No.: 1:22-cv-00884-ADA-BAM

JOINT STIPULATION TO EXTEND TIME FOR PARTIES TO FILE FOR DISMISSAL & (PROPOSED) ORDER

CURRENT DISMISSAL **DOCUMENTS FILING DEADLINE:** JULY 7, 2023

**NEW DISMISSAL DOCUMENTS** FILING DEADLINE: AUGUST 21. 2023

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STIPULATION TO EXTEND TIME FOR PARTIES TO FILE FOR DISMISSAL

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IT IS HEREBY STIPULATED AND AGREED to by Plaintiff Harout Handian and Defendant Wakefield and Associates, LLC that:

- 1. On April 26, 2023, Plaintiff filed a Notice of Settlement.
- 2. On April 27, 2023, the Court orders the Parties to file appropriate dispositional documents no later than May 17, 2023.
- 3. On May 9, 2023, the Parties requested additional time to finalize the settlement agreement, and asked the Court to extend the deadline to file the appropriate dispositional documents to July 7, 2023.
- 4. The Parties have finalized the settlement agreement. However, due to unforeseen circumstances, the Parties took longer than anticipated to finalize the agreement.
- 5. The Parties seek additional time to file the correct dispositional documents. Good cause exists for the proposed extension of this deadline because Plaintiff and Defendant both require additional time in order to fulfil their obligations to the settlement agreement.
- 6. The Parties request that the deadline for filing for dismissal be extended from July 7, 2023, to August 21, 2023.

IT IS SO STIPULATED.

DATED: July 10, 2023

#### THE CARDOZA LAW CORPORATION

BY: /s/ LAUREN B. VEGGIAN LAUREN B. VEGGIAN, ESQ. ANGELY C. GAVIOLA, ESQ. ATTORNEYS FOR PLAINTIFF DAVID MITRE

28 [PROPOSED] ORDER 

## **GORDON REES SCULLY**

# MANSUKHANI, LLP

BY: /s/ SEAN P. FLYNN
SEAN P. FLYNN, ESQ.
ATTORNEY FOR WAKEFIELD AND
ASSOCIATES, LLC

DATED: July 10, 2023

[PROPOSED] ORDER

## **ORDER**

Pursuant to the stipulation of the Parties and good cause appearing, the parties shall file for dismissal on or before August 21, 2023.

IT IS SO ORDERED.

Dated: July 10, 2023 /s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

[PROPOSED] ORDER